

The Honorable Robert S. Lasnik

IN THE UNITED DISTRICT COURT, WESTERN DISTRICT OF WASHINGTON
SEATTLE

MICHAEL THOMAS,

Plaintiff,

v.

GREEN TREE LOAN SERVICING LLC,

Defendant(s).

Case No. 2:15-cv-01309-RSL

**EX PARTE STIPULATED
MOTION TO EXTEND
DISCOVERY DEADLINE**

MOTION

Pursuant to LCR 7, LCR 10(g), and LCR 16, Defendant Green Tree Servicing LLC (“Green Tree”) moves the court for an Order amending the court’s July 20, 2016 Order Setting Trial Date & Related Dates as follows:

Extending the deadline for Discovery to be completed from October 9, 2016 to the new date of October 31, 2016.

All other case schedule deadlines would remain in place.

DISCUSSION

The parties are nearly concluded with the process of exchanging discovery. Counsel for Plaintiff took a deposition of Green Tree’s representative on September 20, 2016. At the deposition, based on the representative’s deposition testimony, counsel for Green Tree agreed to

EX PARTE STIPULATED MOTION TO EXTEND
DISCOVERY DEADLINE - 1

HENRY, DEGRAAFF & MCCORMICK, P.S.
1833 N. 105TH ST. SUITE 203
SEATTLE, WA 98133
telephone (206) 330-0595
fax 1 (206) 400-7609

1 produce additional documents as well as an additional corporate witness to comply with topic in
2 the Notice of Deposition. The parties have agreed to an additional deposition on October 11,
3 2016, and to the production of specifically identified additional documents pursuant to an agreed
4 protective order which has not yet been entered (“agreed-upon Additional Discovery”). The
5 parties are in the process of scheduling a settlement conference in November.

6 Green Tree’s stipulation to the extension of the discovery deadline is conditioned upon
7 the additional time being used solely to conduct the agreed-upon Additional Discovery. Green
8 Tree reserves the right to object to efforts by Plaintiff to seek discovery other than the agreed-
9 upon Additional Discovery between October 10, 2016 and October 31, 2016.

11 The requested extensions of the discovery period should not affect the other case
12 deadlines. It is necessary to facilitate a resolution of the case either through settlement or
13 dispositive motions. As a result, the Plaintiff respectfully requests that the case scheduling order
14 be amended to reset the discovery deadline as set forth above.

16
17 DATED this 6th day of October, 2016.

18
19 /s/ Jacob DeGraaff

20 By: Jacob DeGraaff, WSBA #36713
21 HENRY, DEGRAAFF & MCCORMICK, PS
22 Attorney for Plaintiff Michael Thomas

23 /s/ Laurie R. Hager

24 By: Laurie R. Hager, WSBA #38643
25 Of Attorneys for Defendant Green Tree Servicing LLC
26
27